

**Comments on texts resulting from the Terrestrial Animal Health Code Commission Report –
October 2006 Meeting
Submitted by the United States of America**

Appendix 3.7.3

Guidelines for the Land Transport of Animals

General comments

In the Preamble of the Terrestrial Code Commission's October 2006 Report it is stated that, "The Terrestrial Code Commission noted a recommendation from a Member Country to develop more specific guidance on the transport of poultry and agreed that such work could be undertaken in future." Based on the lack of proposed specific transport guidelines for poultry by land or sea, the United States is not submitting comments specific to the transport of poultry at this time. However, we are concerned about what may happen if attempts are made to apply the current guidelines to the transport of poultry. It is obvious that as written, the current guidelines contain poultry species-specific gaps that might lead to conflicts with current/best practices if attempts are made to apply them to the transport of poultry. It would be beneficial for Member countries to know to what extent, if at all, to apply the current transport guidelines to poultry. If there is the possibility that the current guidelines are not complete enough to provide sufficient guidance on the transport of poultry, it may be premature to include them in the introduction to the guidelines.

Specific comments

Article 3.7.3.2

Responsibilities

Current proposed text:

Item 6: The responsibilities of *Competent Authorities* include: Parts (c) and (d) – "setting standards for the competence of *animal handlers*, drivers, and managers of facilities in relevant issues in animal welfare" and "ensuring appropriate awareness and training of *animal handlers*, drivers and managers of facilities in relevant issues in animal welfare."

Suggested proposed text:

~~Item 6: The responsibilities of *Competent Authorities* include: Parts (c) and (d) – "setting standards for the competence of *animal handlers*, drivers, and managers of facilities in relevant issues in animal welfare" and "ensuring appropriate awareness and~~

~~training of *animal handlers*, drivers and managers of facilities in relevant issues in animal welfare.”; delete Parts (c) and (d) from the guidelines.~~

Comment/Rationale:

The purview of the *Competent Authorities* does not include “setting standards for the competence of drivers, *animal handlers*, and managers of facilities in relevant issues in animal welfare” or “ensuring appropriate awareness and training of *animal handlers*, drivers, and managers of facilities in relevant issues in animal welfare”. These activities are best achieved by market demands and subsequent education; therefore they should be deleted from the guidelines.

Article 3.7.3.4

Planning the Journey

Current proposed text:

Item 4: Part (a) – The second sentence reads “Special attention should be paid to avoid the injury to animals through the use of secure fittings from sharp protrusions.”

Suggested proposed text:

Item 4: Part (a) – Special attention should be paid to avoid the injury to animals through the use of secure fittings from sharp protrusions.

Comment/Rationale:

The suggested change in the text is to clarify the intent of the guideline for the reader.

Article 3.7.3.5

Documentation

Current proposed text:

Item 2: Part (e) - animal identification to allow animal traceability of individual animals to the premises of departure and where possible, to the premises of origin;

Suggested proposed text:

Item 2: Part (e) – animal identification to allow animal traceability of individual or groups of animals to the premises of departure and where possible, to the premises of origin;

Comment/Rationale:

We suggest that the requirement to identify each animal individually be changed to incorporate identification of groups of animals that could be adequately documented to allow animal traceability to the premises of departure. It is acceptable to have documentation that ascribes a group of animals to a source without identifying each animal individually.

Current proposed text:

Item 2: Part (g) - documentation of the period of rest, and access to feed and water, prior to the journey;

Suggested proposed text:

~~Item 2: Part (g) — documentation of the period of rest, and access to feed and water, prior to the journey;~~ delete Part (g);

Comment/Rationale:

The requirement for documentation of the period of rest, and access to feed and water, prior to the journey is administratively excessive and unnecessary therefore, we recommend that this text be deleted.

Article 3.7.3.7

Loading**Current proposed text:**

Item 3: Goads and other aids – The following principles should apply:

Part (c): Useful and permitted gods include panels, flags, plastic paddles, flappers (a length of cane with a short strap of leather or canvas attached), plastic bags and metallic rattles; they should be used in a manner sufficient to encourage and direct movement of the animals without causing undue stress.

Suggested proposed text:

Item 3: Goads and other aids – The following principles should apply:

Part (c): Useful and permitted gods include panels, flags, plastic paddles, flappers (a length of cane with a short strap of leather or canvas attached), plastic bags and ~~metallic~~ rattles; they should be used in a manner sufficient to encourage and direct movement of the animals without causing undue stress.

Comment/Rationale:

We recommend the word metallic be deleted from the guideline, as the consistency of the rattle should not be limited. Plastic, wood, or combinations of materials can be as effective as metal in directing the movement of animals without causing undue stress.

Current proposed text:

Item 3:

Part (i): Performance standards should be established in which numerical scoring is used to evaluate the use of such instruments and to measure the percentage of animals moved with an electric instrument and the percentage of animals slipping or falling as a result of their usage.

Suggested proposed text:

Item 3:

Part (i): Performance standards should only be established where practical, ~~in which~~ If established, they should include numerical scoring that is used to evaluate the use of such instruments, and to measure the percentage of animals moved with an electric instrument and the percentage of animals slipping or falling as a result of their usage.

Comment/Rationale:

We recommend the guideline be changed to allow for the practical application of establishing performance standards, as indicated, that assist with the evaluation of the use of such instruments such as goads and other aids and to measure the percentage of animals moved with an electric instrument and the percentage of animals slipping or falling as a result of their usage. The proposed guideline as written may be too vague to adequately address the concept of establishing and implementing the use of performance standards by individuals that are unfamiliar with their purpose or use. It would be beneficial to the success of implementing performance standards if the OIE defined or clarified what are performance standards, how they are established and what is the expected function or outcome of their use.